

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS, et al.)	
)	
)	
Plaintiffs)	
v.)	No. 6:23-cv-00007
)	
DEPARTMENT OF HOMELAND)	
SECURITY., et al.)	
)	
Defendants.)	

DEFENDANTS’ NOTICE AND REQUEST FOR CONFERENCE

Plaintiffs have filed a Motion to File a Supplemental Complaint, ECF No. 140, and have simultaneously filed a Motion For a Temporary Restraining Order to enjoin U.S. Customs and Border Protection’s May 10, 2023 Policy on Parole with Conditions in Limited Circumstances Prior to Issuance of a Charging Document, ECF No. 141.

Defendants intend to file an opposition to both motions. But before engaging in motion practice, Defendants respectfully request a conference with the Court to discuss the motions, the basis for opposition, and how these new developments might impact current deadlines concerning the impending trial in June, before the Court sets a briefing schedule on the motions. With respect to Plaintiffs’ motion seeking a temporary restraining order, there is no exigency to the motion, nor do Plaintiffs face irreparable harm, because the Policy in question has been enjoined nationally by a district court in Florida as of last night. *See Florida v. Mayorkas, et al.*, 23-CV-9962, ECF No. 10, which is not discussed or addressed in Plaintiffs’ filings.

Date: May 12, 2023

Respectfully submitted,

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